

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,) INDICTMENT CR 14-66 DWF/OSM
)
Plaintiff,) 18 U.S.C. § 2
v.) 18 U.S.C. § 922(g)
(1) CHARLES ELLISON WILLIAMS III,) 18 U.S.C. § 924(c)(1)(A)(i)
) 18 U.S.C. § 924(d)(1)
(2) APRIL FAY LEWIS,) 21 U.S.C. § 841(a)(1)
) 21 U.S.C. § 841(b)(1)(A)
(3) GABRIELLE LEE OLSEN,) 21 U.S.C. § 841(b)(1)(B)
) 21 U.S.C. § 841(b)(1)(C)
(4) KENNETH BRIAN RABENBERG, and) 21 U.S.C. § 846
) 21 U.S.C. § 853
(5) PHOUUMARA TODD SOK,) 28 U.S.C. § 2461(c)
)
Defendants.)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Distribute Methamphetamine)

1. Beginning in or about August 2012, and continuing through in or about November 2013, the exact dates being unknown to the grand jury, in the State and District of Minnesota and elsewhere, the defendants,

**CHARLES ELLISON WILLIAMS III,
APRIL FAY LEWIS,
GABRIELLE LEE OLSEN,
KENNETH BRIAN RABENBERG, and
PHOUUMARA TODD SOK,**

did knowingly and intentionally conspire with one another and others, known and unknown to the grand jury, to possess with the intent to distribute, and to distribute, a

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mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

QUANTITY OF METHAMPHETAMINE INVOLVED IN THE CONSPIRACY

2. With respect to the defendants **CHARLES ELLISON WILLIAMS** and **KENNETH BRIAN RABENBERG**, their conduct as members of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

3. With respect to defendant **PHOUMARA TODD SOK**, his conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 50 grams or more actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

4. With respect to the defendant **GABRIELLE LEE OLSEN**, her conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved 50 grams or more of a mixture and substance containing a detectable amount of

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methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(viii).

5. With respect to the defendant **APRIL FAY LEWIS**, her conduct as a member of the narcotics conspiracy charged in Count One, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged in Count One, involved a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with the Intent to Distribute Methamphetamine and Cocaine)

On or about September 3, 2013, in the State and District of Minnesota, the defendant,

PHOUMARA TODD SOK,

did knowingly and intentionally possess with intent to distribute approximately 111 grams of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and approximately 63.8 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21 United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 3

(Using and Carrying a Firearm During and in
Relation to a Drug Trafficking Crime)

On or about September 3, 2013, in the State and District of Minnesota, the defendant,

PHOUMARA TODD SOK,

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the crime set forth in Count 2 of this indictment, did knowingly use and carry firearms, namely, a Glock .40 caliber semiautomatic pistol, Model 23, serial number PAY076, and an Intratec semiautomatic pistol, Model AB-10, serial number A017039, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

(Felon in Possession of Firearms)

On or about September 3, 2013, in the State and District of Minnesota, the defendant,

PHOUMARA TODD SOK,

having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

Crime	Place of Conviction	Date Committed	Date Sentenced
2 ND Degree Controlled Substance Sales	Olmstead County, MN	2002	August 26, 2002

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knowingly possessed, in and affecting interstate commerce, firearms, that is, a Glock .40 caliber semiautomatic pistol, Model 23, serial number PAY076, and an Intratec semiautomatic pistol, Model AB-10, serial number A017039, in violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT 5

(Possession with the Intent to Distribute Methamphetamine)

On or about October 9, 2013, in the State and District of Minnesota, the defendant,

GABRIELLE LEE OLSEN,

did knowingly and intentionally possess with intent to distribute approximately 30 grams of mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

(Distribution of Methamphetamine)

On or about October 25, 2013, in the State and District of Minnesota, the defendant,

CHARLES ELLISON WILLIAMS,

did knowingly and intentionally distribute approximately 80.4 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

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COUNT 7

(Possession with the Intent to Distribute Methamphetamine)

On or about October 25, 2013, in the State and District of Minnesota, the defendant,

CHARLES ELLISON WILLIAMS,

did knowingly and intentionally possess with intent to distribute approximately 45.7 grams of mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

(Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about October 25, 2013, in the State and District of Minnesota, the defendant,

CHARLES ELLISON WILLIAMS,

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the crime set forth in Count 7 of this indictment, did knowingly use and carry firearms, namely, a .45 caliber Springfield XD-S semi-automatic handgun, serial number XS669723, and a .22 caliber Colt Frontier Scout revolver, serial number 2911Q, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 9

(Felon in Possession of Firearms)

On or about October 25, 2013, in the State and District of Minnesota, the defendant,

CHARLES ELLISON WILLIAMS,

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having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, namely:

Crime	Place of Conviction	Date Committed	Date Sentenced
Theft of Motor Vehicle	Winona County, MN	February 9, 1996	December 9, 1996
Theft of Motor Vehicle	Winona County, MN	October 24, 1996	December 9, 1996
Felon in Possession of a Firearm	Winona County, MN	November 26, 1997	February 25, 1998
1 ST Degree Controlled Substance Crime	Olmsted County, MN	March 14, 2003	August 2, 2004

knowingly possessed, in and affecting interstate commerce, firearms, that is, a .45 caliber Springfield XD-S semi-automatic handgun, serial number XS669723, and a .22 caliber Colt Frontier Scout revolver, serial number 2911Q, in violation of Title 18, United States Code, Sections 922(g)(1), and 924(a)(2).

COUNT 10
(Distribution of Methamphetamine)

On or about December 13, 2013, in the State and District of Minnesota, the defendant,

KENNETH BRIAN RABENBERG,

aided and abetted by others, did knowingly and intentionally distribute approximately 55 grams of a mixture and substance containing a detectable amount of methamphetamine, a

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Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT 11
(Distribution of Methamphetamine)

On or about December 23, 2013, in the State and District of Minnesota, the defendant,

KENNETH BRIAN RABENBERG,

aided and abetted by others, did knowingly and intentionally distribute approximately 57 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT 12
(Possession with the Intent to Distribute Methamphetamine)

On or about December 23, 2013, in the State and District of Minnesota, the defendant,

KENNETH BRIAN RABENBERG,

did knowingly and intentionally possess with intent to distribute approximately 82.5 grams of mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

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FORFEITURE ALLEGATIONS

Counts 1-12 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

If convicted of any of Counts 1, 2, 5-7, or 10-12 of this Indictment, the defendants,

**CHARLES ELLISON WILLIAMS III,
APRIL FAY LEWIS,
GABRIELLE LEE OLSEN,
KENNETH BRIAN RABENBERG, and
PHOUMARA TODD SOK,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds obtained directly or indirectly as a result of each such violation, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations.

If convicted of any of Counts 3, 4, 8, or 9 of this Indictment, the defendants,

**PHOUMARA TODD SOK, and
CHARLES ELLISON WILLIAMS III,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearm with accessories and ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), or 924(c)(1)(A)(i), including:

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- a. a Glock .40 caliber semiautomatic pistol, Model 23, serial number PAY076 and associated ammunition;
- b. an Intratec semiautomatic pistol, Model AB-10, serial number A017039 and associated ammunition;
- c. a .45 Springfield XD-S semi-automatic handgun, serial number XS669723 and associated ammunition; and
- d. a .22 caliber Colt Frontier Scout revolver, serial number 2911Q and associated ammunition.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

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UNITED STATES ATTORNEY

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